

Supreme Court of the United States United States Courts of Appeals

## **CERTIFICATE OF COMPLIANCE**

## No. 21-1195

## ALEXANDRU BITTNER,

Petitioner,

v.

## UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American College of Tax Counsel as *Amicus Curiae* in Support of Petitioner contains 6,195 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2022.

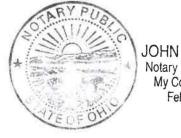
Er Mu

Emily Mullins Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001

BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 Franklin Square 1300 I Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: <u>August 29, 2022</u> John Dr. Dauly Notary Public

[seal]



JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023

.